

EXHIBIT 2

Page 1

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

SHAMARA T. KING, on behalf :
of herself and all others :
similarly situated, :
:
Plaintiff, :
:
vs. : C.A. NO: 10-6850
:
GENERAL INFORMATION :
SERVICES, INC., :
Defendant. :

VIDEOTAPED 30(b)(6) and INDIVIDUAL
DEPOSITION OF: LORI C. WEBB

DATE: June 26, 2012
TIME: 9:04 AM
LOCATION: A. William Roberts, Jr. & Assoc.
1201 Main Street, Suite 1980
Columbia, SC
TAKEN BY: Counsel for the Plaintiff
REPORTED BY: SANDRA K. BJERKE, RDR, CRR, CBC

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1 knowledgeable about the ins and outs of the
2 system's search and query capabilities?

3 A. I believe he knows the search query
4 capabilities and assists in writing the search
5 query capabilities. When you ask about all the ins
6 and outs of the system -- it's a very complex
7 system -- I can't answer that.

8 Q. Okay. Would he be -- he was the
9 person, obviously, that you went to, though; right?

10 A. Correct.

11 Q. All right. Let me just ask you some
12 generalized questions about GIS, okay?

13 A. Okay.

14 Q. And then I'm going to focus a little
15 more specifically, you know, as it pertains to the
16 allegations and the claims in this complaint, okay?

17 GIS is a consumer reporting agency;
18 correct?

19 A. Yes.

20 Q. And as a result, it is regulated by the
21 Fair Credit Reporting Act with regard to the
22 background checks it sells to employers; correct?

23 A. That's correct.

24 Q. All right. Now, in this case GIS sold

1 a background check about the plaintiff in this
2 case, Ms. King, to the United States Postal Service
3 in connection with a job application that she had
4 made; correct?

5 A. Correct.

6 Q. Okay. Are you able to take me through
7 the process of what the company does when a client
8 such as the US Postal Service requests a background
9 check from GIS?

10 A. Yes.

11 Q. All right. Please tell me what happens
12 and how it comes about.

13 A. Well, specifically referring to the
14 United States Postal Service.

15 Q. Okay.

16 A. Because we have many clients --

17 Q. Okay.

18 A. -- whose method of requests varies,
19 really, client by client.

20 The United States Postal Service has an
21 integration with our systems through their system,
22 which I believe is written by SAP. It's called
23 eCareer.

24 Candidates go online and select open

1 A. In this particular case it means that
2 there is presence of public record information
3 under which the United States Postal Service has
4 stipulated that we need to report back to them.

5 Q. Okay.

6 A. They have very broad flagging, if you
7 will.

8 Q. Okay. Under the heading, going down,
9 service summary, there are two services that were
10 performed here: the county criminal search and the
11 KwickScreen search; is that correct?

12 A. That's correct.

13 Q. All right. And would you describe for
14 me what the times referenced to the right of those
15 services indicate?

16 A. Sure.

17 Q. And what they communicate to us?

18 A. February the 23rd, 2010 at 10 o'clock,
19 2 minutes and 17 seconds after the hour in the
20 morning the work order came into the system for
21 fulfillment through the process that I described
22 earlier.

23 And the date of March the 2nd, 2010,
24 6:56:42 seconds PM was when the KwickScreen